IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

UNITED STATES EQUAL EMPLOYMENT)
OPPORTUNITY COMMISSION,) Case No. 1:17-cv-01084-AJT-JFA
)
Plaintiff,)
)
v.)
)
CAMBER CORPORATION,)
)
Defendant.)
)

JOINT MOTION FOR APPROVAL AND ENTRY OF CONSENT DECREE AND WAIVER OF HEARING

Plaintiff, the United States Equal Employment Opportunity Commission and Defendant Camber Corporation hereby respectfully submit this Joint Motion for Approval and Entry of Consent Decree. As grounds for the motion, the parties state as follows:

- 1. EEOC initiated this action, alleging violations Title I of the Americans with Disabilities Act of 1990 (ADA), as amended, Title I of the Civil Rights Act of 1991 and the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 621, et seq. (ADEA). Defendant denied the allegations.
- 2. Pursuant to Order (Doc. 48) and as a result of having engaged in comprehensive settlement negotiations, the parties agree to resolve this action on the terms reflected in the executed Consent Decree, attached as Exhibit 1.
- 3. The attached Consent Decree reflects the terms of monetary and injunctive relief to which the parties have agreed.
 - 4. Undersigned parties waive hearing on this motion.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court grant this Joint Motion for Approval and Entry of Consent Decree and execute the attached Consent Decree.

Dated the 19th day of June, 2018.

Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DEBRA M. LAWRENCE
Regional Attorney
U.S. EEOC Philadelphia District Office
City Crescent Building, 3rd Floor
10 South Howard Street
Baltimore, MD 21201
(410) 209-2734 Telephone
(410) 962-4270 Facsimile

KATE NORTHRUP Supervisory Trial Attorney U.S. EEOC Baltimore Field Office kate.northrup@eeoc.gov

JEFFREY A. STERN
Senior Trial Attorney
/s/Jeffrey A. Stern
Jeffrey A. Stern (pro hac vice)
U.S. EEOC Cleveland Field Office
(Ohio Bar No. 0020107)
jeffrey.stern@eeoc.gov

DAVID STAUDT Local Counsel Senior Trial Attorney /s/David Staudt U.S. EEOC Baltimore Field Office Va. Bar No. 47442

CAMBER CORPORATION

/s/David P. Phippen
David P. Phippen (VA Bar 22854)
12500 Fair Lakes Circle, Suite 300
Fairfax, VA 22033
Telephone: 571.522.6105
Facsimile: 571.522.6101
dphippen@constangy.com

Donald S. Prophete (pro hac vice) 2600 Grand Blvd., Suite 750 Kansas City, MO 64118 Telephone: 816.472.6400 Facsimile: 816.472.6401 dprophete@constangy.com

Robert L. Ortbals, Jr. (pro hac vice) 7733 Forsyth Blvd., Suite 1325 St. Louis, MO 63105 Telephone: 314.925.7270 Facsimile: 314.925.7278 rortbals@constangy.com

Attorneys for Defendant

IT IS SO ORDERED:		
DATED:	United States District Judge	

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

UNITED STATES EQUAL EMPLOYMENT)	
OPPORTUNITY COMMISSION,)	Case No. 1:17-cv-01084-AJT-JFA
)	
Plaintiff,)	
)	
v.)	
)	
CAMBER CORPORATION,)	
,)	
Defendant.)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2018, I filed the parties' Joint Motion for Approval and Entry of Consent Decree and Waiver of Hearing, with proposed Consent Decree attached, using the CM/ECF system, which will send a notification of such filing (NEF) to all ECF counsel of record in this matter.

s/David Staudt
David Staudt
Va. Bar ID # 47442
U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Baltimore Field Office
GH Fallon Federal Building
31 Hopkins Plaza, Suite 1432
Baltimore, MD 21201
Phone: 410-209-2249

Fax: 410-962-4270 david.staudt@eeoc.gov